

REMARKS

This application has been reviewed in light of the Office Action dated November 17, 2003. Independent Claim 21 has been amended to define more clearly what Applicants regard as their invention. Claims 28-32 and 34 have been amended as to matters of form and Claim 55 has been added. Support for Claim 55 may be found at least on page 18 line 23 to page 21 line 7 and in figures 8-10. Claims 22, 27, and 37-54 have been cancelled, without prejudice or disclaimer of subject matter. Claims 21, 23-26, 28-36 and 55 are pending in this application. Favorable reconsideration is requested.

The Office Action objected to the drawings under 37 C.F.R. § 1.83(a) for failing to show every feature of the invention specified in the claims. Specifically, the Office Action indicated that the “grid” feature found in dependent Claim 39 was not supported in the drawings. Claim 39 has been cancelled rendering this objection moot.

The Office Action found the title of the invention to be not descriptive. The title of the invention has now been amended to more clearly identify and describe the Applicants invention. Applicants therefore respectfully request withdrawal of this objection.

Claims 28-32, 34, 47-50, and 52 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention. Claims 28-32 and 34 have been amended to provide proper antecedent basis for the elements found in those claims and now particularly point out and distinctly claim the subject matter of the invention. Applicants, therefore, respectfully request reconsideration and withdrawal of this rejection. Claims 47-50 and 52 have been cancelled rendering the rejections under 35 U.S.C. § 112, with respect to those claims moot.

Claims 21, 24-25, 28, 35, 37-38, 42-43, 46, and 53 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,350,886 (*Pommerrenig*). Claims 21, 25, 27, 37, 43, and 45 were rejected as being anticipated by U.S. Patent No. 5,569,390 (*Endo*). Additionally, Claims 21-25, 37, and 39-43 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,635,718 (*DePuydt et al.*). Claims 21-23, 25-27, 29-32, 37, 40-42, 44-45, and 47-50 have been rejected under § 102(e) as being anticipated by U.S. Patent No.

5,804,832 (*Crowell et al.*). Furthermore, Claims 33, 36, 51, and 54 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of *Crowell et al.* Cancellation of Claims 22, 27, and 37-54 renders any rejections with respect to those claims moot.

Applicants submit that amended independent Claim 21 together with the remaining dependent claims are patentably distinct from the cited prior art at least for the following reasons. Claim 21 as amended is a photoelectric conversion device comprising a plurality of substrates each having a plurality of photoelectric conversion elements. The plurality of substrates are adjacent to each other, and there is a wavelength converting member located between the photoelectric conversion elements and a conductive member. The conductive member is stacked and arranged on the photoelectric conversion elements over the plurality of substrates and the conductive member is also grounded.

One of the key features of the present invention is that the conductive member is disposed of on the wavelength converting member and is connected to a terminal for grounding, thereby aiding in the prevention of the effects of radiation noise on large-screen sensors such as contact type sensors that have two-dimensionally mounted photoelectric conversion elements. Applicants believe that the prior art of record taken either separately or in combination fails to teach this key feature.

Pommerrenig discloses a multi-element imaging device that uses a plurality of radiation sensitive imaging chips affixed to a transparent insulating base material 20 where the material contains a conductive member (electrical bus) 32.

Endo, as understood by applicant discloses a multi-layered circuit board which forms the base of a contact image sensor board. The sensor chips of *Endo* are mounted on a multi-layered printed circuit board composed of a substrate, a first conductive layer, an internal insulator layer, and a second conductor layer and a surface insulator layer.

DePuydt et al. discloses a multimode radiation detecting device and a radiation detecting module wherein the module includes a carrier substrate and a radiation detecting tile mounted over a conductive carrier substrate 16.

Crowell et al. is directed towards a digital array for capturing a radioagram. The array disclosed includes a flat base on which is mounted a plurality of shock absorbing mounts and a rigid support plate. The plate mounts such that the panel “floats” over the base and the electrical circuitry associated with the radiation detector panel is mounted to the panel with flexible connectors. The top cover 38 of the digital array is a conductive member which allows for transmission of x-ray radiation while enabling grounding of the digital array unit.

Nothing, however, has been found in these references whether they are taken alone or in combination to teach or suggest that the conductive member be disposed of on a wavelength converting member that is connected to a terminal for grounding. Accordingly, Applicants submit that for at least these reasons, Claim 21 is patentable over the art of record taken separately or in any proper combination.

The other rejected claims in this application depend from independent Claim 21 discussed above, and therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual consideration or reconsideration, as the case may be, of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address given below.

Respectfully submitted,


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